

Hon. Ricardo S. Martinez

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,)
)
Plaintiff,) NO. CR 05-346 RSM
)
v.) STIPULATION AND ORDER
) TO CONTINUE TRIAL DATE
ELIZABETH ANGOUS,)
)
Defendant.)

It is stipulated by and between the United States of America, by Assistant United States Attorney Susan Harrison, and defendant Elizabeth Angous, by her attorney Ralph Hurvitz, that trial in this case may be continued from November 28, 2005 to March 27, 2006, with a new motions cut off date of March 2, 2006.

A superseding indictment was recently returned against Ms. Angous charging thirty three counts of bank fraud, four counts of wire fraud, one count of fraud in relation to access devices, one count of misuse of the social security number of

RALPH HURVITZ
ATTORNEY
1420 FIFTH AVENUE, SUITE 3150
SEATTLE, WA 98101
206.223.1747

1 another, and three counts of aggravated identity theft.
2 Counsel was recently appointed to substitute for Jennifer
3 Horwitz as counsel for Ms. Angous. Counsel requires
4 additional time in order to familiarize himself with the
5 extensive discovery material in this case. It may be possible
6 that with additional time, Ms. Angous may resolve her case
7 short of litigation of pretrial motions and trial.

8 The parties stipulate that the ends of justice served by
9 continuing the trial date outweigh any interests of the public
10 or of the defendant in a speedy trial as per 18 U.S.C.
11 §3161(c)(1). Ms. Angous has discussed her right to a speedy
12 trial with counsel, and will file a waiver of speedy trial
13 through April 1, 2006.

14 Dated this 16th day of November, 2005.

15 s/Ralph Hurvitz
16 RALPH HURVITZ
Attorney for Defendant
17 WSBA 7365
1420 Fifth Avenue
Suite 3150
18 Seattle WA 98101
Tel: 206.223.1747
19 Fax: 206.467.1823
E-mail: ralph@hurvitz.com

20
21 s/Susan Harrison
SUSAN HARRISON
22 Assistant United States Attorney
700 Stewart Street
23 Suite 5220

24 STIPULATION AND ORDER-2

25 RALPH HURVITZ
ATTORNEY
1420 FIFTH AVENUE, SUITE 3150
26 SEATTLE, WA 98101
206.223.1747

Seattle WA 98101
Tel: 206.553.7970
Fax: 206.553.2502
E-mail: sue.harrison@usdoj.gov

ORDER

The court has considered the stipulation of the parties concerning a continuance of the trial date in this case. The court finds that the ends of justice served by continuing the trial date outweigh any interests of the public or of the defendants in a speedy trial as per 18 U.S.C. §3161(c)(1).

Trial in this case is hereby continued to March 27, 2006. The new motions cut off date is March 2, 2006.

Dated this 18th day of November, 2005.



RICARDO S. MARTINEZ
UNITED STATES DISTRICT JUDGE

RALPH HURVITZ
ATTORNEY
1420 FIFTH AVENUE, SUITE 3150
SEATTLE, WA 98101
206.223.1747

1 STIPULATION AND ORDER-3

2

3

4

5

6

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

RALPH HURVITZ
ATTORNEY
1420 FIFTH AVENUE, SUITE 3150
SEATTLE, WA 98101
206.223.1747